

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:) Chapter 11
Stream TV Networks, Inc., et) Bankruptcy No. 23-10763 (DJB)
al.)
Debtors.)
William A. Homony, in his)
Capacity as Chapter 11)
Trustee of the Bankruptcy)
Estates of Stream TV)
Networks, Inc.) Adv. No. 25-00138- (DJB)
and Technovative Media, Inc.)
Plaintiff)
v.)
Rembrandt 3D Holding Ltd.,)
Visual Semiconductor, Inc.,)
Mathu Rajan,)
Raja Rajan, and)
Brown and Michaels, P.C.,)
Defendants.)

NOTICE OF MOTION

**DEFENDANT'S MOTION TO COMPEL DISCOVERY
RESPONSES FROM PLAINTIFF
RELATING TO DEFENDANT'S MOTION FOR SANCTIONS PURSUANT TO
BANKRUPTCY RULE 9011, FRCP 11, 28 U.S.C. § 1927, AND THE COURT'S
INHERENT AUTHORITY**

TO: All Creditors and Parties in Interest

PLEASE TAKE NOTICE that on June 3, 2025 (refiled) (originally May 7, 2025), Raja Rajan (Defendant in Adversary Action and Unsecured Creditor, (the “Movant”) filed a

**DEFENDANT'S MOTION TO COMPEL DISCOVERY RESPONSES FROM
PLAINTIFF** (the “Motion”) in the above-captioned Chapter 11 case. The Motion seeks an order from the Court directing the Chapter 11 Trustee, William Homony to provide limited discovery related to the Plaintiff Trustee’s good faith relating to another Motion for Sanctions relating to the **adversary action**.

HEARING ON THE MOTION

A hearing on the Motion will be held before the Honorable Judge Derek J. Baker, United States Bankruptcy Judge, on:

Date: 7/1/2023

Time: 1:00

Location: Zoom video conference or United States Bankruptcy Court Eastern District of Pennsylvania

Example: 900 Market Street, Philadelphia, PA 19107
Courtroom No. 2.

OBJECTIONS OR RESPONSES

Any party wishing to oppose the relief requested in the Motion must file a written response with the Clerk of the Bankruptcy Court and serve a copy on the undersigned counsel **at least seven (7) days before the hearing date**, in accordance with Local Bankruptcy Rule 9014-3.

If no response is timely filed and served, the Court may grant the relief requested in the Motion without further notice or hearing.

Dated: June 3, 2025

Respectfully submitted,
/s/
Raja Rajan, Esquire
Unsecured Creditor and Defendant in
Adversary Proceeding
Pro Se

CERTIFICATE OF SERVICE

I, Raja Rajan, certify that I caused the filing of the aforementioned and each party in interest was notified by the Court's system.

/s/
Raja Rajan
Unsecured Creditor and Defendant in Adversary Action